

1 COLIN L. COOPER, SBN 144291
2 KELLIN R. COOPER, SBN 172111
3 DUSTIN GORDON, SBN 205216
4 COOPER LAW OFFICES
5 800 Jones Street
6 Berkeley, California 94710
7 Telephone (510) 558-8400
8 Fax (510) 558-8401

9 Attorneys for Defendant
10 DERRIK DENNIS

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 OAKLAND DIVISION

14) CR 13-cr-742-JST-1

15)

16)

17 UNITED STATES OF AMERICA,) STIPULATION AND ORDER

18 Plaintiff,)

19)

20 vs.)

21)

22 DERRIK DENNIS,)

23)

24 Defendant.)

25)

17 This matter is currently set for a status conference on March 14, 2014 at 9:30 a.m. The
18 parties hereby stipulate to vacate that date and reset the hearing for April 11, 2014 at 9:30 a.m.
19 The parties are requesting more time to allow the Government time to seek approval for a
20 proposed negotiated disposition and to allow the defense additional time to research the
21 guidelines and to propose a potential disposition with Mr. Dennis.

22 The defendant and the government consent to the extension of time, and the parties
23 represent that good cause exists for this extension, including the effective preparation of counsel.
24 The parties agree that the time between March 14, 2014 and April 11, 2014 should be excluded
25

1 under the Speedy Trial Act; *See* 18 U.S.C. §3161(h)(7)(B)(iv). The parties also agree that the
2 ends of justice are served by granting an extension and that an exclusion of time outweighs the
3 best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §3161(h)(7)(A).

4

5 SO STIPULATED: March 11, 2014

6 _____/s/
7 COLIN L. COOPER
8 Attorney for DERRIK DENNIS

9 _____/s/
10 WADE RHYNE
11 Assistant United States Attorney

12 **ORDER**

13 For the reasons stated above, the Court sets Friday, April 11, 2014, at the hour of 9:30
14 a.m. as the date for the status conference. The court also finds that the exclusion of this period
15 from the time limits applicable under 18 U.S.C. §3161 is warranted, and that the ends of justice
16 served by the continuance outweigh the interests of the public and the defendant in a speedy trial
17 for the periods from March 14, 2014 to April 11, 2014, *See* 18 U.S.C. §3161(h)(7)(A); and that
18 the failure to grant the requested exclusion of time would deny counsel for the defendant and for
19 the government the reasonable time necessary for effective preparation and continuity of
20 counsel, taking into account the exercise of due diligence, and would result in a miscarriage of
21 justice. *See* 18 U.S.C. §3161(h)(7)(B)(iv).

22 IT IS SO ORDERED.

23 Dated: March 11, 2014

24 
25 JON S. TIGAR
United States District Court Judge